

**RECEIVED**

MAR 30 2017

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA

IN THE SUPREME COURT

---

Appeal from Lexington County

Perry H. Gravely, Circuit Court Judge

---

CARRIE CALLAHAM,

PETITIONER

V.

STATE OF SOUTH CAROLINA,

RESPONDENT

APPELLATE CASE NO 2016-001744

---

SUPPLEMENTAL APPENDIX

---

SUSAN B. HACKETT  
Appellate Defender

ALAN WILSON  
Attorney General

South Carolina Commission on Indigent  
Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211-1589  
(803) 734-1330

JESSICA KINARD  
Assistant Attorney General  
Attorney General Office  
P. O. Box 11549  
Columbia, SC 29211

ATTORNEY FOR PETITIONER

ATTORNEYS FOR RESPONDENT

**INDEX**

INDEX ..... i  
AMENDED APPLICATION FOR POST CONVICTION RELIEF ..... 1

STATE OF SOUTH CAROLINA )  
COUNTY OF LEXINGTON )

IN THE COURT OF COMMON PLEAS  
2014-CP-32-1177

Carrie Callaham, )  
Applicant, )

vs. )

AMENDED APPLICATION  
FOR POST CONVICTION RELIEF

State of South Carolina, )  
Respondant. )

Based upon further investigation and research, the Post-Conviction Relief Application filed on behalf of the above named Applicant is hereby Amended as follows to include in addition to prior grounds stated in the original application for post-conviction relief:

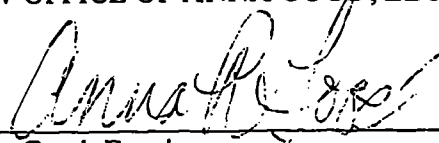
11. State concisely and in the same order the facts which support each of the grounds set out in (10):

- (a) Ineffective assistance of trial counsel – trial counsel failed to properly prepare for trial with the defendant, including not reviewing discovery with the Applicant;
- (b) Ineffective assistance of trial counsel—trial counsel failed to properly advise client as to testifying in the Jackson v. Denno hearing and failed to call the defendant to testify as to voluntariness;
- (c) Ineffective assistance of trial counsel—trial counsel failed to properly object to witnesses testifying to hearsay, specifically Abdul Bargas and Sergeant Robert McIntyre;
- (d) Ineffective assistance of trial counsel—trial counsel failed to poll the jury; and
- (e) Ineffective assistance of appellant counsel—appellant counsel failed to properly appeal the issue of witness Marcello Prado's testimony admissibility.

18. Amend the attorneys who represented Applicant to include appellate counsel:

Katherine Hudgeons

LAW OFFICE OF ANNA GOOD, LLC



---

Anna Good, Esquire  
Attorney for Applicant  
PO Box 7284  
Columbia, SC 29202  
803-661-6758  
803-403-8752 (fax)  
anna@annagoodlaw.com

Columbia, South Carolina

This 29<sup>th</sup> day of October, 2015



